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*Bankruptcy Counsel to the Securities
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

Hearing date: July 20, 2023 at 2:00 p.m. (ET)
Obj. Deadline: July 13, 2023 at 4:00 p.m. (ET)

**SECURITIES LITIGATION LEAD PLAINTIFFS' RESERVATION OF RIGHTS
REGARDING THE DISCLOSURE STATEMENT WITH RESPECT TO THE
AMENDED JOINT PLAN OF GENESIS GLOBAL HOLDCO, LLC ET AL., UNDER
CHAPTER 11 OF THE BANKRUPTCY CODE**

Remo Maria Morone, William McGreevy, Ashwin Gowda, Translunar Crypto LP, and
Christopher Battenham (collectively, the "Lead Plaintiffs"), in their capacity as the named, court-

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

appointed co-lead plaintiffs in the securities class action pending in the United States District Court for the District of Connecticut (the “Connecticut District Court”) under the caption *William McGreevy, Ashwin Gowda, Translunar Crypto LP, Christopher Battenham, and Alex Sopinka, individually and on behalf of all others similarly situated v. Digital Currency Group, Inc. and Barry Silbert*, Case No. 3:23-cv-00082 (the “Securities Litigation”), on behalf of themselves and the proposed class they seek to represent in the Securities Litigation (collectively, the “Class”), hereby submit this reservation of rights with respect to the *Disclosure Statement with Respect to the Amended Joint Plan of Genesis Global Holdco, LLC et al., Under Chapter 11 of the Bankruptcy Code* (the “Disclosure Statement”) [Docket No. 429] for the *Debtors’ Amended Joint Chapter 11 Plan* (the “Plan”) [Docket No. 427] and respectfully state as follows:

RESERVATION OF RIGHTS

1. The Lead Plaintiffs do not oppose approval of the Disclosure Statement or the solicitation procedures proposed in connection therewith (the “Solicitation Procedures”), each in its current form and based upon the Plan in its current form.

2. However, Lead Plaintiffs, on behalf of themselves and the Class, reserve all rights with respect to any modification, amendment, or supplement to the Disclosure Statement, Solicitation Procedures, or Plan, including but not limited to the right to object thereto on any basis whatsoever.

[Remainder of page intentionally left blank]

Dated: July 12, 2023

LOWENSTEIN SANDLER LLP

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